

1 KAREN P. HEWITT
United States Attorney
2 CAROLINE J. CLARK
Assistant U.S. Attorney
3 California State Bar No. 220000
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, California 92101-8893
5 Telephone: (619) 557-7491
Facsimile: (619) 557-5004
6 E-mail: caroline.clark@usdoj.gov

7 Attorneys for Defendants

8
9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 WEN-CHENG HSIUNG, CHIA HUI)
TANG, PEI YU HSIUNG, YUEH LING)
12 HSIUNG,)

13 Plaintiffs,)

14 v.)

15 ROBERT S. MUELLER, III, Director,))
Federal Bureau of Investigation; GERARD)
16 HEINAUER, Acting Director, Nebraska)
Service Center, USCIS; EMILIO T.)
17 GONZALEZ, Director, USCIS; PAUL)
PIERRE, District Director, USCIS,)
18 MICHAEL CHERTOFF, Secretary,))
Department of Homeland Security;))
19 MICHAEL MUKASEY, Attorney General,))

20 Defendants.)
21

Case No. 07cv2418 BTM (JMA)

JOINT MOTION TO EXTEND TIME FOR
FILING OF RESPONSIVE PLEADING

[Fed.R.Civ.P. 6(b)(1)]

22 COME NOW THE PARTIES, Plaintiffs Wen-Cheng Hsiung, et al., by and through counsel,
23 Linda W. Lau, and Defendants Robert S. Mueller, et al., by and through their counsel, Karen P. Hewitt,
24 United States Attorney, and Caroline J. Clark, Assistant United States Attorney, and hereby jointly move
25 the Court to extend the time for filing of Defendants' responsive pleading. The parties are working
26 toward an extrajudicial resolution of Plaintiffs' complaint, and the parties have agreed that additional
27 time is required before Defendants' filing of any responsive pleading in order to pursue resolution of
28 Plaintiffs' claims without the intervention of the Court. In order to address Plaintiffs' claims and

1 without waiving Defendants' rights to defend the causes of actions and allegations, including the right
2 to file any FED. R. CIV. P. 12 motions to dismiss, the parties jointly request this extension of time. Based
3 upon the foregoing, it is respectfully requested that the Court enter an order, under FED. R. CIV. P.
4 6(b)(1), expanding the time for the filing of Defendants' responsive pleading until **April 10, 2008**.

5
6 DATED: March 3, 2008

s/ Linda W. Lau

7 LINDA W. LAU
8 Attorney for Plaintiffs
E-Mail: linda@lindalau.net

9 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
10 of the United States District Court for the Southern District of California, I certify that the content of
11 this document is acceptable to counsel for the Plaintiffs and that I have obtained authorization from
12 Linda W. Lau to affix her electronic signature to this document.

13
14 DATED: March 3, 2008

KAREN P. HEWITT
United States Attorney

15
16 s/ Caroline J. Clark

17 CAROLINE J. CLARK
18 Assistant United States Attorney
Attorneys for Defendants
E-Mail: caroline.clark@usdoj.gov